

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE LAW FIRM OF HUGH H. MO, P.C.,

Case No. 1:20-cv-07077 (AKH)

Plaintiff,

-against-

NG LAP SENG a/k/a DAVID NG,

NOTICE OF MOTION

Defendant.

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NG LAP SENG a/k/a DAVID NG,

Third-Party Plaintiff,

-against-

HUGH H. MO,

Third-Party Defendant.

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NG LAP SENG a/k/a DAVID NG,

Counterclaim Plaintiff,

-against-

THE LAW FIRM OF HUGH H. MO, P.C.,

Counterclaim Defendant.

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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Hugh H. Mo, dated August 13, 2021 the exhibits attached thereto, and the accompanying Memorandum of Law, and all prior pleadings and proceedings had herein, Plaintiff/Counterclaim Defendant The Law Firm of Hugh H. Mo (the “Mo Firm”) and Third-party Defendant Hugh H. Mo (“Mo”) by and through their counsel, The Law Firm of Hugh H. Mo, P.C., shall move this Court before the

Honorable Alvin K. Hellerstein at The Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order, pursuant to Federal Rule of Civil Procedure ("Fed. R. Civ. P.") 36(a) (6) determining the sufficiency of Defendant and Counterclaim/Third-party Plaintiff Ng Lap Seng's ("Ng") responses to the Mo Firm's and Mo's Amended Request for Admissions.

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. P. 7(d), papers in opposition to this motion shall be filed on or before _____, 2021.

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. P. 7(d), reply papers shall be filed on or before _____, 2021.

Dated: New York, New York
August 13, 2021

THE LAW FIRM OF HUGH H. MO, P.C.

By: 

Hugh H. Mo
Pedro Medina
Elizabeth L. Mo
The Law Firm of Hugh H. Mo, P.C.
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*Attorneys for The Law Firm of Hugh H. Mo,
P.C. and Hugh H. Mo.*

TO: Sari E. Kolatch
Stephen Wagner
420 Lexington Ave., Suite 2400
New York, New York 10170
Attorneys for Ng Lap Seng

RULE 37(a) (1) CERTIFICATION

I, Hugh H. Mo, counsel for Mo Firm and Mo, hereby certifies that on August 6, 2021, I conferred by telephone and electronic correspondence with Sari Kolatch, Esq., counsel for Ng, in a good faith attempt to resolve the issues framed by this Motion seeking a determination of the sufficiency of Ng's responses to the Mo Firm's and Mo's Amended Request for Admissions. At that time, the parties were unable to resolve disputed issues thereby requiring the filing of this Motion.

Dated: New York, New York
August 13, 2021



Hugh H. Mo